

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA                    )  
  )  
                  v.                            ) Criminal No. 05-11 Erie  
  )  
KENNETH FLEETWOOD                        )  
a/k/a Michael R. Johnson                 )

**MOTION FOR EXTENSION OF TIME  
TO RESPOND TO MOTION TO SUPPRESS**

AND NOW comes the United States of America, by and through its attorneys, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Marshall J. Piccinini, Assistant United States Attorney for said district, and avers as follows:

1. On July 1, 2005, the defendant, through counsel, filed a Motion to Suppress with Citation to Authorities.
2. The government's response to the defendant's motion is due by July 15, 2005. Fed.R.Crim.P. 45
3. Undersigned counsel will be out of the office during the time when the government's response is due, and therefore, needs additional time to complete the government's response.
4. The defendant's attorney, Thomas Patton, has no objection to an extension of time.

WHEREFORE, the government respectfully requests this Court to grant it an extension of time in which to complete its response to the defendant's motion to suppress.

Respectfully submitted,

MARY BETH BUCHANAN  
United States Attorney

s/Marshall J. Piccinini  
MARSHALL J. PICCININI  
Assistant U.S. Attorney  
PA ID No. 56362